WILDCAUGHT
FISHERS COALITION
BY FISHERS, FOR FISHERS

Submission on the NSW Yellowtail Kingfish Harvest Strategy

Wild Caught Fishers Coalition
Consultation draft | 20 September 2026
Prepared for review before lodgement
To the NSW Department of Primary Industries and Regional Development

BY FISHERS, FOR FISHERS

Evidence, accountability and a viable future for locally caught seafood

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SOURCE KEY

S1 *— NSW Yellowtail Kingfish Stock Assessment 2026*
S2 *— Draft NSW Yellowtail Kingfish Harvest Strategy*
M *— NSW Yellowtail Kingfish Harvest Strategy Working Group meeting minutes*
C *— WCFC consultation evidence, including survey, telephone and written responses*

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WCFC CORE POSITION

WCFC supports conserving Yellowtail Kingfish and maintaining the public's access to locally caught seafood. We ask DPIRD to revise the proposed strategy so that its assessment, management controls and allocation arrangements demonstrably account for how fishers operate and how the evidence is collected. The principal issue is whether the fish observed in the data adequately represent the population and the fishing pressure being managed. WCFC strongly opposes interim monthly catch limits on a commercial sector already depleted in participation and operating capacity.

WCFC's core position is that Yellowtail Kingfish must be managed sustainably, but management decisions must be based on representative evidence and applied fairly across all sectors. WCFC supports conservation and the public's access to locally caught seafood. It does not accept that uncertainty in recreational estimates, or recent catch proportions shaped by commercial contraction, should automatically become a permanent burden on commercial operators.

Commercial fishers choose species, grounds, methods and buyers according to expected returns and practical constraints. Those decisions affect which fish are caught, landed and measured. If the observation process changes, the resulting records can change even when abundance does not. This first-principles argument identifies explanations that an assessment must distinguish; it does not establish the present abundance of Kingfish.

Our consultation raises specific questions about reduced commercial participation, alternative targets, access restrictions, market and size preferences, recreational targeting and predator losses. We request a published response linking each issue to the relevant data, model treatment, sensitivity test and management consequence. Any immediate conservation measures should be proportionate to the assessed risk, monitored across sectors and open to timely correction.

CONSULTATION UNDERTAKEN BY WCFC

The WCFC survey was conducted during September 2026 and sought input from commercial fishers with experience in the Yellowtail Kingfish and Snapper fisheries. All responses received during the survey period have been considered together as part of the same consultation process.

The responses covered Kingfish, Snapper or both fisheries and provided a range of operational observations, experiences and views. Contributors who supplied information through more than one form of consultation have not been counted twice.

While the responses were weighted toward South Coast fishing experience and should not be interpreted as a statistically representative measure of statewide abundance or industry consensus, they provide important qualitative evidence about changes in fishing behaviour, effort, spatial access, market preferences and other operational factors that may influence the interpretation of fishery-dependent data.

ESTABLISH WHAT THE DATA REPRESENT

The 2026 assessment uses commercial-only abundance indices and commercial port/market length samples; recreational harvest comes from six surveys, interpolation and historical reconstruction. Age-composition inputs cover 1999–2001. It includes selectivity adjustments and sensitivity tests. [S1, pp 10–17, 97–98]

DPIRD should quantify the influence and representativeness of each data stream. More commercial measurements cannot establish how well recreational size composition or alternative commercial sales channels are represented.

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THE OBSERVATION PROCESS MUST BE TESTED

A simple conceptual relationship explains our concern. For a given period and fish size, the fish appearing in a sample depend on several successive processes:

$$C = N \times E \times T \times A \times G \times S \times L$$

$$Assessment\ sample = Observed\ catch \times Sampling\ coverage$$

C is observed catch; N available fish; E effort; T targeting; A access; G geographical coverage; S selectivity; and L landing success. These are explanatory relationships, not a fitted stock-assessment equation. The factors interact and are not assumed independent. Effort includes effective fishing activity; geographical coverage describes the areas and conditions actually searched by the participating fleet; targeting describes the choice to pursue Kingfish; selectivity concerns which sizes are captured; landing success includes losses before landing. Sampling coverage describes which landed fish are actually measured. The same logic applies to each fishing sector.

Fewer commercial operators, less directed Kingfish fishing, lost access and preference for particular market sizes can change the commercial observations. Recreational participation, technology and trophy preferences can create a different observation pattern. Neither pattern alone describes the entire population. The task is to determine which differences are material and whether the model adequately accounts for them.

Commercial contraction can reduce both the amount of effort and the geographical coverage of commercial observations. Buyouts, consolidation and closures remove vessels and grounds from the observation system. A fleet of 50 fishers can distribute effort across substantially more locations than a fleet of two. If the remaining fishers are concentrated in a smaller set of accessible grounds, lower catch or CPUE may reflect reduced spatial coverage and concentrated effort rather than a uniform decline across the wider stock. This is an inference requiring testing, not a claim that the stock is healthy.

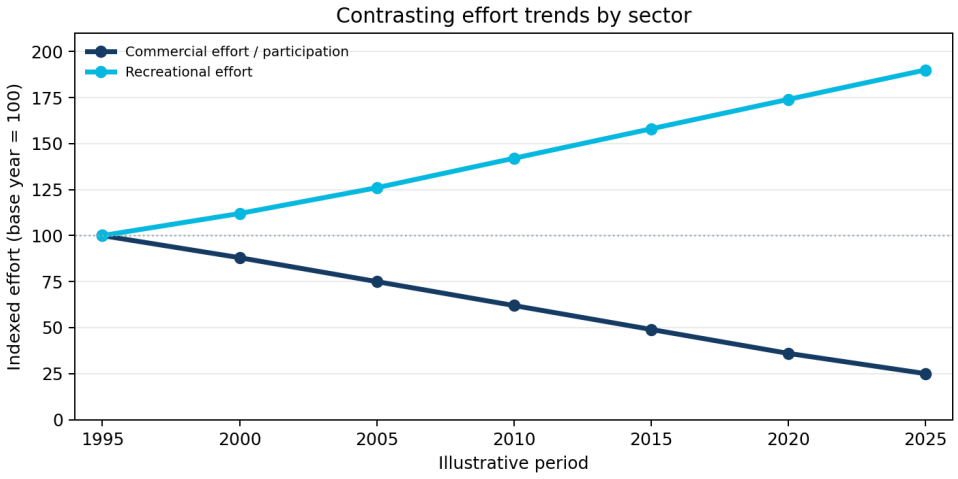


Figure 1. Indexed conceptual comparison of commercial and recreational effort. Both series begin at 100 in the base year; the direction of each line illustrates the concern raised by WCFC. The values are not a measured annual time series and must not be read as quantitative estimates of total effort. DPIRD should replace this communication aid with a documented, sector-comparable series using verified participation and effort data where available.

MARKET ROUTES AND SIZE SELECTION

Fishers consulted by WCFC describe demand for box-sized Kingfish, including 65–80 cm and 70–85 cm fish. Some report choosing bait, leader, methods or grounds to favour those sizes. Others cannot reliably select size, although they prefer smaller market fish. Preference, practical selection and a fish's susceptibility to capture must therefore be examined separately. [C1–C3]

WCFC has received reports that larger Kingfish may attract better negotiated prices through direct sales. Any assessment of commercial distribution and market selectivity should therefore include Melbourne markets, regional buyers and other direct-sales channels, not only Sydney Fish Market data. Several respondents reported selling approximately 25% of their relevant catch through Sydney Fish Market, while most reported that the proportion sold through that market was 50% or less. The destinations and size composition of the remaining catch have not yet been established. [C2–C3]

A fish may be included in a commercial catch return without ever entering the market sample used to estimate length or age composition. DPIRD should identify coverage by buyer, region, season and size. If larger fish disproportionately pass through less-sampled channels, a market sample could underrepresent them. This is a hypothesis requiring linked landing, sales and measurement records, not an established statewide bias.

The working group itself identified this risk in November 2024: changes to fish-receiver fees could redirect sales away from traditional sampling locations, requiring monitoring adjustments. We request the follow-up analysis and any changes implemented. [M7, pp 4–5]

Recreational trophy preferences also require measured evidence. Photographs and reports from recreational or spear fishers can identify sampling opportunities, but cannot establish population-wide abundance or prove that most recreational harvest comprises breeders. The useful comparison is a representative size distribution by sector and method, with the sampling limitations disclosed.

EXPLAIN THE BIOMASS MEASURE AND MODEL CHANGE

The assessment estimates 2025 spawning biomass at 5.5% of unfished biomass, with a reported 95% interval of 0.5–16.6%. Its plausible scenarios also indicate a depleted stock. The assessment reports spawning, exploitable and total biomass, and describes spawning biomass as the preferred indicator for management. However, estimating spawning biomass does not mean that the underlying observations provide an unbiased sample of mature breeding fish. The model remains dependent on assumptions about age, size, sex, maturity, selectivity, catchability and the relative likelihood of different fishing sectors encountering and retaining larger fish. [S1, pp 4, 11, 47, 51]

The assessment may be scientifically sophisticated, but sophistication does not remove the consequences of a weak or unsupported baseline. If the unfished biomass reference point is overstated, the model will systematically express the current stock as more depleted. The resulting management outcome may therefore reflect the assumptions used to define the historical benchmark as much as the fishery's actual present condition.

In February 2024, the working group had considered total biomass as a possible Kingfish indicator because catches were mainly juvenile. WCFC asks DPIRD to explain how that earlier reasoning was resolved, and to show the practical implications of choosing the spawning indicator. [M5, p 6]

The proportion of fish contributing to reproduction depends on age, size, sex and maturity. Inferring that component from selective catches makes the treatment of availability and capture patterns consequential. DPIRD should demonstrate whether the management advice is robust to the combined effects of commercial market preferences, less-sampled sales channels and different recreational targeting.

The assessment acknowledges an uncertain unfished starting condition in 1940 and limitations in recreational estimates; some additional recreational-catch tests are described as preliminary and unpublished. [S1, pp 48–49] WCFC requests reproducible results, clear historical assumptions and tests of plausible combinations of uncertainty. A change in model or biomass definition is not itself evidence of error. Comparisons must use equivalent measures, years and stock boundaries.

ASSESS A MOBILE STOCK ACROSS ITS RANGE

The report explains its NSW data scope by its NSW management purpose and the concentration of harvest in NSW. [S1, p 6] That explains the management emphasis; WCFC asks for a separate demonstration that the geographical assessment assumptions adequately represent movement and recruitment.

The minutes record cross-jurisdictional concerns, a Victorian presentation describing increased Kingfish availability since 2010, and review of Commonwealth catch and observer information. External evidence was therefore considered, although its role as direct model input or contextual evidence needs clarification. [M2, p 3; M8, pp 5–6; M9, p 5]

We request a dataset register for Queensland, Victoria, Commonwealth waters and the other parts of the eastern stock, stating what was included, excluded or used only to inform assumptions. The tests should distinguish local depletion from movement, changing availability and changes in recruitment from outside the sampled grounds. A fish sold in Melbourne but caught in NSW raises a market-coverage question; a fish caught in Victorian waters raises a stock-coverage question.

Changes in distribution do not make fishing mortality irrelevant. They change what NSW controls can reasonably achieve and how progress should be measured. A rebuilding indicator should be interpreted alongside movement and environmental evidence before a failure to meet projections automatically leads to more restrictive commercial controls.

EFFORT, SPATIAL COVERAGE AND LANDING SUCCESS CHANGE THE RECORDS

WCFC consultation identifies declining commercial activity alongside increased recreational activity, although the reported scale of change differs between locations and individual operations. Some responses describe a significant decline in commercial activity and only a slight increase in recreational activity, while individual directed effort remained approximately stable over the previous five years. Personal effort over a five-year period and perceived fleet-wide activity over a ten-year period measure different things and must not be treated as equivalent indicators. [C1–C3]

Commercial contraction has reduced not only total effort but also the area over which commercial fishers can observe and interact with Kingfish. Historical grounds may be closed, inaccessible or no longer economically reachable, while the remaining vessels may be concentrated in a limited number of grounds. DPIRD should distinguish reduced fleet size, reduced spatial coverage and reduced catchability when interpreting commercial catch and CPUE. [C1–C3]

Fishers also report choosing bonito or slimy mackerel when those species offer better returns. Falling Kingfish abundance could itself encourage switching, so the cause cannot be assumed. DPIRD should combine fisher interviews with trip-level records, prices and costs to distinguish directed effort, incidental catch and changes in participation. Standardisation can address some differences; reduced fleet size alone does not invalidate a standardised catch-rate index.

Lost access, crowding and displacement can change where observations occur and the cost of obtaining them. Consultation identifies historical grounds affected by restrictions and reports difficulty working around concentrated recreational vessels. We seek mapping against verified access rules and trip records. Closed grounds cannot simply be assumed empty, nor can their existence establish the amount of protected biomass. [C1–C3]

Predator reports include hooked fish being lost before landing, relocation and abandonment of fishing. On some occasions respondents report being unable to land any fish. A landed-catch index can then differ from an encounter index. DPIRD should record both the effect on fishing behaviour and any associated mortality, with safeguards against double counting. [C1–C3]

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ALLOCATION MUST ACCOUNT FOR HISTORY, SUPPLY AND ACCOUNTABILITY

The proposed 50:50 resource share is based on recent commercial catch records and recreational estimates. A recent recorded split is not, by itself, a neutral measure of a fair future allocation. Commercial catch has been produced under repeated reductions in active participation, access restrictions, spatial displacement, size and gear controls, and other regulatory constraints. If those policies suppressed commercial catch, using that suppressed catch to set a continuing share can convert historical contraction into a permanent allocation disadvantage.

Allocation should therefore consider more than recent harvest percentages: historical commercial grounds and access; the capacity of commercial fishers to provide locally caught seafood to consumers who do not fish; regional businesses and succession; and foreseeable domestic demand for identifiable Australian seafood as origin-labelling reforms make local product more visible. AIM-related demand is a reason to test future supply needs, not a claim that demand has already increased.

A resource share also requires a comparable accountability pathway. The recreational share is managed largely through periodic survey estimates and review of bag, boat and seasonal limits, while commercial operators face direct catch records and enforceable monthly limits. WCFC asks DPIRD to establish mandatory or near-real-time recreational reporting sufficient to detect departures from the recreational share and trigger corrective action. If recreational harvest is not required to be reported with comparable reliability, it is inequitable to impose precise, enforceable limits on commercial operators while leaving the other sector to an estimation system that may not detect overharvest promptly. WCFC supports equivalent accountability for both sectors, not less reporting by either.

Sector accountability comparison

Issue	Commercial sector	Recreational sector
Primary evidence	Direct commercial catch records, CPUE and port or market samples.	Periodic recreational surveys, historical reconstruction and available on-site or near-real-time sources.
Proposed controls	Interim monthly catch and possession limits, including zero retention in other sectors.	Bag, boat and possession limits, with possible seasonal catch-and-release arrangements.
Review pathway	Limits may be adjusted within a fishing period against the commercial share.	Reviews are linked mainly to new biennial harvest estimates and seek to maintain the share on average.
WCFC concern	Directly measured and enforceable burdens are imposed on a contracted fleet.	Uncertainty and delayed detection may shift the risk of overharvest onto commercial operators.

Table 1. The draft strategy assigns sectoral shares but uses different evidence and correction pathways. WCFC seeks equivalent accountability and a demonstrated ability to detect and correct departures from each sector's share. [S2, pp 13–15]

WCFC strongly opposes the proposed interim monthly catch limits. Further restricting an already contracted commercial sector risks undermining active businesses, seasonal fishing opportunities and local seafood supply. Calling these controls interim does not reduce their immediate business consequences.

The draft proposes monthly controls for line east and line west, zero retention for other commercial fisheries and OTLF sectors, and a future ITQ system. Monthly limits are reviewed annually and may change within a fishing period where catches are expected to be under- or over-constrained against the commercial share by more than 10%. [S2, p 14]

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A fisher emphasised that initial monthly amounts are not guaranteed and expressed concern that downward adjustments are more likely than increases. This is a concern about future implementation, not a measured probability. Separately, phase one permits reductions in the recommended biological catch but prevents increases until the spawning-biomass trigger is exceeded and phase two begins. That stock-wide rule is distinct from adjustments to individual monthly limits within the sector share. [C2; S2, pp 11–14]

Fishers also warn that the arrangements could activate businesses that do not currently target Kingfish, including through leasing and nominated-fisher arrangements. If additional operators take catch within a constrained sector share, pressure to lower individual monthly amounts could follow, further reducing opportunity for established operators. This is a plausible incentive effect requiring testing, not a claim that activation has already occurred. DPIRD should assess participation and leasing responses before implementing the controls. [C2]

A consultation response reports catches exceeding 650 kg in thirteen of sixty-two calendar months and questions the basis for that amount. This should be treated as an operator-level consultation example, not as evidence that the strategy creates a permanent 650 kg entitlement. Its impact depends on the amount of excess catch, the income generated during those months, seasonal availability, weather and the operation's broader business circumstances. DPIRD should therefore compare monthly controls with annual and seasonal flexibility, including appropriate carry-forward provisions. [C1–C3]

Restrictions can also transfer effort: the same respondent expects to target more Snapper if constrained on Kingfish. Kingfish management must assess this consequence alongside the Snapper strategy. Reductions in one species' recorded landings do not, alone, demonstrate the intended overall outcome.

For recreational fishing, controls should address retained catch and release mortality, including repeated encounters with undersize fish. Reports of intensive catch-and-release warrant verification, not an assumed mortality percentage. Size samples should distinguish line, spear and charter fishing where feasible. Suspected trap interference must remain distinct from witnessed conduct; reports of lead-lining require method-specific investigation. [C1–C3]

COMPARE SIZE RULES AND PROTECT ACTIVE PARTICIPATION

Raising a minimum size can allow more fish to reach maturity, but also changes the sizes that may lawfully be retained and the number released. WCFC asks for comparisons that include those behavioural responses. A rule's biological effect cannot be settled simply by saying fish should spawn once, or by assuming that retaining smaller fish always protects breeders.

Consultation responses identify possible alternatives including lower minimum sizes combined with upper limits, regional approaches and restrictions on retaining larger fish. Suggested options include a 60–100 cm size range and a possible 200–250 kg day-trip limit. These are options raised for evaluation, not agreed WCFC limits. Any comparison should clearly specify whether measurements refer to total or fork length and assess maturity, release survival, catch substitution and total annual mortality. Preventing market gluts is an economic objective, and its biological effects require separate analysis. [C1–C3]

Nominated-fisher experiences differ. Some respondents raise concerns about participation and leasing; others report no noticeable expansion and value alternating work with a skipper. DPIRD should examine actual effort, compliance and business arrangements before making general claims or removing legitimate flexibility. [C1–C3]

Allocation should recognise verified participation and reliance, while addressing interruptions, lease-dependent operators, entry pathways and concentration. Previous expenditure on access does not determine a sustainable catch level, but further restrictions impose cumulative costs that must be assessed. Commercial fishing also provides access for seafood consumers; local supply belongs in the evaluation of management alternatives.

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REQUESTED CHANGES BEFORE FINALISATION

1. Publish a response to the evidence questions. Identify the datasets, sampling coverage, model assumptions and test results addressing each issue in Annex C. Where information already exists, provide the specific result and explain its consequence.

2. Test representativeness and uncertainty together. Examine market-channel coverage, sector-specific size selection, directed effort, access and predator losses. Extend technical review to unresolved issues, with working fishers able to explain reporting and targeting practices.

3. Establish a funded monitoring programme. Prioritise recreational size and mortality data, alternative commercial sales channels, movement and predator losses. Specify responsible agencies, delivery dates and how new evidence changes decisions.

4. Remove the proposed interim monthly limits. WCFC strongly opposes these controls on an already contracted commercial sector. Consult on alternatives addressing conservation risk, seasonal opportunity, incidental catch and business continuity. Test activation of currently non-targeting businesses, leasing responses and effort transferred to Snapper before selecting controls.

5. Make review responsive to causes. Review implementation after the first full fishing year and complete a substantive review within three years, or earlier when risk warrants. Allow stronger protection when justified and redesign or relaxation when evidence supports it.

6. Reassess the unfished biomass baseline. The stock assessment states that its assumption of an unfished population in 1940 is “unlikely to be true”. Because the unfished biomass estimate forms the denominator used to calculate the current spawning-biomass ratio, an overstated baseline will mechanically produce a more severe depletion result. DPIRD should therefore publish sensitivity analyses using alternative historical baselines, including scenarios in which the stock was already partially depleted before 1940. These scenarios should show how different unfished biomass assumptions affect the estimated current biomass ratio, stock classification, rebuilding timeframe, total allowable catch and proposed sector controls. No restrictive management response should be treated as proportionate until the effect of this acknowledged baseline uncertainty has been transparently tested.

WCFC asks DPIRD to test the link between observed fish, inferred stock condition and the controls imposed. This will make conservation decisions more credible, their burdens more defensible and their outcomes easier to verify.

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CONCLUSION

The central issue is not whether Yellowtail Kingfish should be managed sustainably. WCFC supports responsible management, conservation and the continued availability of locally caught seafood. The issue is whether the proposed controls are justified by evidence that adequately represents the whole fishery and distinguishes genuine changes in abundance from changes in how, where and by whom fish are caught and recorded.

The available assessment relies heavily on commercial catch records and commercial fishery-dependent length samples, while the coverage of Sydney Fish Market, regional, Melbourne and direct-sales channels remains unclear. Much of the sample data has been gathered from a commercial sector that has contracted, lost access to historical grounds and changed its fishing behaviour in response to market demand, regulation and declining participation. At the same time, recreational effort, targeting methods, trophy-fish selection, release mortality, alternative sales channels and the movement of this migratory stock remain less directly measured. A decline in recorded commercial catch cannot therefore be treated as conclusive evidence of an equivalent decline in total stock abundance without first testing these changes in the observation process.

This concern is heightened by the assessment's own acknowledgement that its assumption of an unfished population in 1940 is "unlikely to be true". Because the unfished biomass estimate forms the denominator used to calculate the current spawning-biomass ratio, an overstated historical baseline will mechanically produce a more severe depletion result. The assessment should therefore demonstrate how alternative, lower historical baselines would alter the estimated biomass ratio, stock classification, rebuilding timeframe and proposed management controls.

The proposed 50:50 allocation and interim monthly commercial limits compound this evidentiary problem. They risk converting the consequences of historical commercial reductions, access restrictions and recreational expansion into a permanent disadvantage for the remaining commercial sector, while imposing precise and enforceable restrictions on commercial fishers without an equivalent reporting and accountability system for recreational harvest.

WCFC therefore strongly opposes the proposed interim monthly limits. Before further restrictions are imposed, DPIRD should publish the underlying datasets and assumptions, test the representativeness of commercial and recreational evidence, account for market and size selectivity, assess stock movement across jurisdictions, test alternative unfished biomass baselines, establish comparable accountability between sectors and evaluate the likely effects on participation, leasing, displaced effort and local seafood supply.

Until that work is completed, the proposed controls should not be treated as a sufficient or proportionate response to uncertainty. A credible harvest strategy must protect the resource without assuming that the remaining commercial fishers are an adequate proxy for the entire fishery, or making one sector carry the consequences of incomplete evidence and an acknowledged weakness in the historical baseline.

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ANNEX A — CONSULTATION EVIDENCE

C1–C3 identify the WCFC consultation materials used in this annex, including survey responses, telephone discussions and written fisher contributions. The findings are qualitative and preserve differences between respondents. Individual contributors and contact details are omitted.

Market preferences and sales coverage

WCFC consultation identifies preferred commercial Kingfish sizes including 65–80 cm, 70–85 cm and a broader 65–100 cm range. Fishers describe influencing size through bait, leader, fishing grounds and method choice. Box-sized fish in the 65–80 cm range are reported to attract stronger market demand, while larger fish may be more difficult to catch because they are more wary or “hook smart”. The evidence therefore supports investigating multiple forms of size and market selectivity rather than treating commercial size selection as uniform. [C1–C3]

Several respondents reported selling approximately 25% of their relevant catch through Sydney Fish Market, while most reported that the proportion sold through that market was 50% or less. The destinations and size composition of the remaining catch have not yet been established. [C2–C3]

Effort, access and operational costs

WCFC consultation consistently identifies declining commercial activity alongside increased recreational activity, although the reported scale of change differs between locations and individual operations. One fisher reports that personal directed effort remained approximately stable over five years while overall commercial activity declined significantly and recreational activity increased slightly over ten years. These measures describe different aspects of effort and should not be treated as interchangeable. Reports of switching between Kingfish, bonito, slimy mackerel and other species require testing against trip, catch, price and operating-cost records. [C1–C3]

Fishers identify South Coast and metropolitan grounds affected by access restrictions, crowding or displacement. One account concerns the south-east corner of Montague Island and reported differences between recreational, charter and commercial access. That specific account should be verified against the location, dates and governing rules before being relied upon as a statement of current law.

Consultation also records substantial business costs associated with reform, including a reported expenditure of $36,000 on additional shares to continue operating. This is evidence of a reported business cost and should not be treated as a verified valuation or an indicator of stock status. [C1–C3]

Predation and recreational interactions

Fishers report predator effects ranging from individual losses to frequent disruption, relocation and occasions when no fish could be successfully landed. Reports include seals taking hooked fish around Montague Island and increasing shark interactions in recent years. These accounts do not establish a statewide mortality rate, but they demonstrate the need to distinguish fish encountered, fish hooked, fish lost to predators and fish successfully landed. [C1–C3]

Consultation identifies recreational crowding that can displace commercial fishers, delay the setting or retrieval of gear, require travel to alternative grounds and create conflict or safety concerns. Reports also include occasional use of lead-lining in areas where commercial Kingfish fishing occurs and suspected interference with commercial traps. Suspected interference is kept distinct from directly witnessed conduct.

One fisher reports observing recreational fishers catch and release up to 300 undersize fish in a day. This figure requires verification of the date, location, number of boats, fishing method and circumstances. It should not be treated as a verified statewide estimate or as proof of a particular mortality rate. [C1–C3]

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Management preferences and differing views

Consultation does not establish consensus on a statewide size rule, nominated-fisher arrangements or the preferred allocation mechanism. Views include support for lower minimum sizes combined with upper limits, restrictions on the retention of very large fish, day-trip limits and improved recreational reporting. These options require biological, behavioural and economic testing before adoption.

Operators also report different experiences of nominated-fisher arrangements. Some identify concerns about leasing, participation and the possible activation of businesses that do not currently target Kingfish, while others report operational flexibility and no noticeable increase in the number of operators. These differences should be investigated through actual effort, catch, compliance and business records rather than generalised from individual experiences.

Consultation reports catches exceeding 650 kg in thirteen of sixty-two calendar months. This represents approximately 21% of the reported months, but not 21% of income, catch or fleet-wide activity. The example should inform operator-level testing of monthly limits, seasonal flexibility, carry-forward provisions and displaced effort into Snapper, rather than being extrapolated across the commercial fleet. [C1–C3]

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ANNEX B WHAT THE WORKING GROUP RECORDED

This chronology distinguishes recognition of an issue from evidence that it has been resolved. The later assessment must also be considered; meeting discussions alone do not establish the final model settings.

May 2023 Meeting 2

The Kingfish FishPath exercise was scoped to NSW fishing, while the minutes recognised the wider eastern stock and possible need to account for cross-jurisdictional mortality. Recreational survey uncertainty was acknowledged. The group also discussed commercial and recreational objectives for fish size. [M2, pp 3, 7]

February 2024 Meeting 5

The group considered different biomass indicators: spawning biomass for Snapper and potentially total biomass for juvenile-dominated Kingfish catches. It also recognised that fishing in other jurisdictions could limit what NSW reductions achieve. [M5, p 6]

November 2024 Meeting 7

The minutes record concern that changes in fish-receiver costs could redirect sales away from co-ops and Sydney Fish Market, affecting sampling representativeness. They also record smaller Kingfish price advantages, commercial endorsement reductions and uncertainty in recreational catch. [M7, pp 4–6, 8–9]

April 2025 Meeting 8

Movement was discussed through selectivity assumptions; the model then lacked explicit spatial structure. Victorian representatives reported increased availability and catches since 2010 and interest in collaboration. Commercial structural adjustments were expected to have reduced pressure. [M8, pp 5–6]

August 2025 Meeting 9

DPIRD reviewed satellite and gamefish tagging plus Commonwealth high-seas catch and observer data. The discussion recognised movement, commercial catches dominated by smaller fish and greater recreational recapture of large tagged fish. Different selectivity functions for fishing fleets were raised as a possibility. [M9, pp 5–6]

The question carried into this submission

WCFC seeks the chain of evidence from these discussions to the adopted assessment and controls: which concerns prompted changes, which were tested, which remain unresolved, and what uncertainty remains in the management advice. The request is for a documented response to the operational evidence, including the new consultation findings.

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ANNEX C QUESTIONS AND REQUESTED TESTS

For each item, DPIRD should identify the relevant published section, supply the result or dataset where appropriate, state any limitation and explain whether it changes the proposed controls.

C1 Data provenance and influence

Provide a register separating catch totals, abundance indices, lengths, ages, tagging and biological parameters. Identify sector, method, jurisdiction, years, sampling intensity, missing observations, weighting and influence on results. Distinguish reported catch from sampled fish. Explain the treatment of charter, cultural and unreported removals without assuming a magnitude unsupported by evidence.

C2 Market and size coverage

Quantify coverage of Sydney Fish Market, regional co-ops, Melbourne and other markets, processors and direct sales. Link measurement coverage to the size distribution and destination of landings where possible. Test whether plausible under-sampling of large fish changes spawning estimates or recommended catch. Report the response to the sampling concern recorded in Meeting 7.

C3 Sector and method selectivity

What data distinguish commercial market selection from recreational trophy preferences, spear fishing and charter activity? Which selectivity parameters are shared or independently estimated, and why? Test plausible fleet differences and changes through time, including interactions with sales-channel coverage. Identify whether competing explanations can actually be distinguished by the available data.

C4 Model development and baseline

Explain the choice of principal biomass indicator in light of Meeting 5. Present comparable trajectories using the same years and geographical scope, distinguishing spawning, exploitable and total biomass. Test plausible earlier fishing and initial depletion assumptions. Explain the difference between uncertainty within the chosen model and uncertainty about its structure. Provide outstanding test outputs and the response to peer-review recommendations.

C5 Recreational reconstruction and current removals

How do survey coverage, response uncertainty, retained-fish weights, species identification, interpolation and historical reconstruction affect the catch series? What evidence captures participation, technology and changes in targeting? Test alternative histories and current estimates jointly with selectivity and release mortality. Establish a practical measurement programme and explain how departures from sector shares will be detected and corrected.

C6 Spatial scope and recruitment

List Victorian, Queensland, Commonwealth and other eastern-stock datasets considered, including reasons for omission or contextual-only use. Test alternative movement, availability and external-recruitment assumptions. Identify the biological quantity represented by the NSW estimate and the evidence validating its boundary. Distinguish interstate catches from interstate sales of NSW-caught fish. Set a timetable for cooperative assessment and management.

C7 Directed effort and catchability

How has the loss of vessels, closures and consolidation changed the geographical coverage of commercial observations? Map historical and current fishing grounds, participating vessels, trip locations and unobserved areas. Test whether the remaining fleet samples the same range of habitats, seasons and conditions as the former fleet.

Test the effects of target switching, alternative-species profitability, changes in participating vessels, fishing power, zero catches and incidental encounters. State how hours or days become Kingfish-directed effort. Compare conclusions across credible record-selection rules, and provide results with and without relevant abundance indices. Explain what the data can establish about fish abundance independently of behaviour.

C8 Access, spatial coverage and predator losses

Map historical and current accessible grounds, participating-vessel coverage, sampling coverage and displaced effort. Quantify the loss of spatial coverage caused by closures, buyouts and fleet contraction. Separate refuge effects from unobserved abundance. Develop trip-level records of encounters, landings, damaged fish, predator losses and abandoned effort. Test the effects on catch-rate interpretation and mortality accounting without double counting. Investigate crowding and alleged gear interference through appropriate evidence and compliance processes.

C9 Monthly controls and seasonal alternatives

Test the derivation of monthly amounts and their adjustment rules, including downward and upward changes, notice, consultation and evidence required. Test whether leasing or nominations could activate currently non-targeting businesses, increasing aggregate take and pressure for lower individual limits. Provide operator-level results for existing and newly active fishers. Compare annual, seasonal and daily alternatives, carry-forward, weather interruptions, discards, costs and equivalent mortality. Quantify effort displaced to Snapper and explain proposed zero retention for incidental Kingfish. WCFC seeks removal of interim monthly limits, not merely clarification of their initial amount.

C10 Size rules and large fish

Compare higher minima, lower minima with upper limits, regional rules and limits on large recreational fish per person or vessel. Specify total or fork length consistently. Model survival to maturity, retention, release mortality and changed targeting, including repeated undersize encounters. Assess the proposed 60–100 cm and daily-limit options as consultation suggestions, not as established biological improvements.

C11 Allocation and active fishing

Test whether a 50:50 share based on recent catches remains equitable after accounting for historical commercial access, regulatory contraction, displaced grounds, public seafood supply, future local demand and succession. Publish equivalent reporting and correction obligations for both sectors. If recreational harvest is not measured with comparable reliability, explain why enforceable commercial limits are justified.

Publish consequences of sectoral shares and commercial allocation alternatives for active operators, lease-dependent fishers, inactive holders and new entrants. Assess catch history alongside exceptional interruptions and entry opportunities. Investigate nominated-fisher participation using actual records and preserve legitimate roster flexibility. Quantify cumulative business costs and effects on local seafood availability.

C12 Review and implementation

Define measurable biological, sampling, operational and economic indicators, responsible agencies and delivery dates. Specify how operational explanations for a catch-rate decline will be investigated with fishers. Distinguish failure of a control from movement, monitoring change or model revision. Provide a route to correct controls in either direction, with interim action tied to stated risk and review dates.

Consultation Draft